February 9, 1994 CD-94-02(LDV/LDT/ICI/SM/LIMO)

Dear Manufacturer:

Subject: Testing Vehicles Equipped with Daytime Running Lights

On January 11, 1993 the National Highway Traffic Safety Administration (NHTSA) issued a final rule in the Federal Register (58 FR 3500) permitting the optional use of daytime running lights (DRLs) on motor vehicles effective February 10, 1993. This rule allowed the installation of DRLs without the potential violation of certain state laws that have the effect of prohibiting DRLs.

Since that notice, EPA has received questions as to how emissions and fuel economy testing would be performed on vehicles equipped with the lights. In particular, there was concern that since DRL operation results in some power consumption, fuel economy testing with the lights on would result in a slight, but measurable, decrease in Corporate Average Fuel Economy (CAFE). Appeals were made to EPA to allow testing with the lights deactivated so that manufacturers could promote the potential safety benefits of the lights without incurring a CAFE penalty.

After consultation with NHTSA on the appropriateness of avoiding CAFE effects by disabling the DRLs during testing, NHTSA issued a letter to EPA on January 12, 1994 (enclosed) asking for assistance to promote the installation of DRLs so that their true safety potential can be evaluated. As a result, EPA will permit for now, emissions and fuel economy testing with DRL systems disabled.

Manufacturers wishing to avail themselves of this option should request special test procedures under 40 CFR 86.090-27. In the request, the manufacturer should describe how the DRL system works and how the manufacturer intends to deactivate the system for testing. EPA retains the option to test for emissions with the system on to assure that the activated system does not cause significant emissions increases. Therefore, manufacturers should assure that vehicles are designed to meet emissions standards with the system activated. Also, given that the manufacturer is still required to meet emission standards with the system activated, and that the emissions impact of the DRL system is likely to be insignificant, in-use testing programs (including Recall and Selective Enforcement Audit) will not necessarily deactivate the systems for testing.

EPA plans to allow this special test procedure until NHTSA is able to assess the full effects of the DRL systems. We would anticipate

that this will encompass several model years. At some time in the future, in consultation with NHTSA, we will determine a permanent test procedure regarding DRLs. In addition to in-use safety information that NHTSA will evaluate, both EPA and NHTSA will assess the progress being made by manufacturers in designing and installing DRL systems that minimize power usage, thereby maximizing in-use fuel efficiency.

Sincerely,

Robert Maxwell, Director
Certification Division
Office of Mobile Sources

Enclosure

G:\CPB\BALL\DRLMFR

U.S. Department
of Transportation

400 Seventh Street S.W.
Washington, DC 20590

**National Highway
Traffic Safety
Administration**

JAN 12, 1994

Mr. Robert E. Maxwell
Director, Certification Division
Environmental Protection Agency
2565 Plymouth Road
Ann Arbor, MI 48105

Dear Mr. Maxwell:

Per our conversation on January 7, 1994, this letter is intended to explain the National Highway Traffic Safety Administration's (NHTSA) policy re: daytime running lamps (DRLs). NHTSA has performed research on and has concluded that their use will increase daytime vehicle conspicuity. Whether this increased conspicuity will cause a reduction in crashes, and whether any increase in glare may offset such a reduction in the United States remains to be seen. In acting to amend our lighting safety standard to permit DRLs and thus, override certain state laws having the effect of prohibiting DRLs, it was and still is our hope that DRLs will be used on our highways. This can be accomplished best by vehicle manufacturers offering DRLs as optional vehicle equipment. As DRL use increases, this will afford an opportunity to evaluate DRL performance under the broad geographic and road conditions that exist throughout the country.

Because DRL use will likely cause a small fuel economy deficit, it is reasonable to ask whether this should be considered in Corporate Average Fuel Economy (CAFE) testing. You have stated that your test procedures are not as clear as they could be relative to your testing approach regarding the use of DRLs during testing. Because NHTSA's desire is to see the voluntary use of DRLs for the purpose of understanding their safety potential, any assistance EPA can provide would be appreciated. Should NHTSA find that DRLs are useful and cost effective safety devices, and that finding result in them becoming

mandatory, we would formally review the effect of that amendment on the CAFE rules and propose amendments if appropriate. Until that time, however, I believe that we should work together to promote further understanding of these devices.

Sincerely,

Barry Felrice
Associate Administrator
  for/Rulemaking